

DANIL EZEKIEL FAUST
aka Dañilo Augusto Feliciano
GENERAL DELIVERY
Washington, DC 20018
SSN# XXX-XX-5866
Plaintiff

vs

STATE OF LOUISIANA
Defendant

Case #:
COMPLAINT

TO THE HONOURABLE ELIZABETH L. GUNN, BANKRUPTCY JUDGE

JURISDICTION

- ## VENUE

2. This is a core proceeding within the meaning of 28 U.S.C. §157(b)(2)(E). If and to the extent that any part, portion or aspect of this Adversary Proceeding is beyond the subject matter jurisdiction of this Court, and to the extent it is constitutionally permissible to confer jurisdiction upon this Court by consent, the Plaintiff hereby grants such consent to the subject matter jurisdiction of this Court, and to the Court's entry of final orders, judgments and decrees, reviewable on appeal only, to the United States District Court for the District of Columbia.

PARTIES

3. Plaintiff DANIL EZEKIEL FAUST, also known as Dañilo Augusto Feliciano, is one of the people and a veteran of the United States Armed Forces.
4. Defendant THE STATE OF LOUISIANA is a state of the United States.
5. Defendant ROBERT KYLE ARDOIN, (hereinafter “ARDOIN”) in his official capacity as the Louisiana Secretary of State.

BACKGROUND FACTS

6. On 1 November 2022, the Plaintiff cast his ballot in the 2022 Federal Election for the Senator of Louisiana. **[Exhibit 1]**
7. The underlying administrative case of the Plaintiff was filed on 20 December 2022 (“Petition Date”), when the Plaintiff filed his voluntary petition under Chapter 7 of the Bankruptcy Code, 11 U.S.C. §101, et seq to retrieve the permanent paper record of this ballot as required by the Help America Vote Act Title III, Section 301 (a)(2)(B)(i) and Section 301 (a)(2)(B)(iii).
8. On 13 February, 2023, Plaintiff submitted a Notice and Demand to the Defendant notifying the Louisiana Secretary of State that the permanent paper record was to be classified as a chose in action, and this right of action would be assigned to the corporation known as None of the Above owned by the Plaintiff, and further would be assigned to the supreme Court of the united States. **[Exhibit 2]**
9. On 13 February, 2023, Plaintiff submitted a Notice to the Supreme Court of the United States of this transfer of the chose in action. **[Exhibit 3]**
10. On 26 January 2023, during the 341 hearing, Plaintiff verbally informed the counsel for the United States Trustee KRISTEN S. EUSTIS that he wished to transfer the chose in action to the corporation owned by the Plaintiff, NONE OF THE ABOVE, to be further assigned to the supreme Court of the united States.

COUNT 1 – FALSE CLAIMS WITH INTENT TO DEFRAUD

11. ARDOIN, in his official capacity as the Louisiana Secretary of State, did knowingly and willfully present, and caused to be presented, false, fraudulent, and fictitious claims for payment or approval to the Government of the United States, dependant upon compliance of section 301 of the Help America Vote Act, with actual knowledge that such claims were to be used contrary to the conditions listed contrary to the provisions of 31 U.S.C. §3729 (a)(1)(A). **[Exhibit 4]**

12. ARDOIN, in his official capacity as the Louisiana Secretary of State, did knowingly and willfully make, use, and cause to be made and used, false records and statements material to a false and fraudulent claim dependent upon the compliance of section 301 of the Help America Vote Act, with actual knowledge and reckless disregard of the truth that such funds were to be used contrary to the provisions of 31 U.S.C. §3729 (a)(1)(B)
13. ARDOIN, in his official capacity as the Louisiana Secretary of State, did knowingly and willfully neglect and fail to comply with his duty to retain and preserve any record or paper for a period of twenty-two months from the date of any general, special, or primary election of which candidates for the office of President, Vice President, presidential elector, Member of the Senate in accord and satisfaction with the provisions of 52 U.S.C. §20701

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this honorable Court respectfully requests that this Court enter judgment in favor of the Plaintiff as follows:

1. Entry of a judgment that the Louisiana Secretary of State breached his duty of loyalty to the Plaintiff in connection with Federal Elections.
2. Entry of a judgment that the State of Louisiana is not in compliance with the Help America Vote Act, Title III, Section 301 (a)(2)(B)(i) and Section 301 (a)(2)(B)(iii) and no such permanent paper records as required exists.
3. Entry of a judgment against the State of Louisiana for the chose in action and act of damaging public records.
4. Such other and further relief as the Court deems just and equitable

DATED: 16 March 2023

Respectfully submitted,

DANIL EZEKIEL FAUST
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